

Federal Defenders OF NEW YORK, INC.

Southern District
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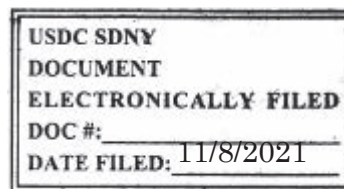
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Executive Director
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Southern District of New York
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November 5, 2021

BY ECF

Honorable Alison J. Nathan
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007



Re: United States v. Andrew Joyner,
20 Cr. 505 (AJN)

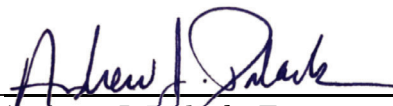
Dear Judge Nathan:

I write to provide the Court with an update regarding Mr. Joyner's neuropsychological evaluation in connection with the above-captioned case. Upon the Court's issuance of the defense-proposed Order directing the United States Marshals to transport Mr. Joyner to Bellevue Hospital, I conferred further with the Associate Executive Director of Bellevue and a Deputy United States Marshal. Unfortunately, for several reasons, some of which relate to Mr. Joyner's status as a federal detainee, Dr. Miranda Rosenberg will not be able to evaluate Mr. Joyner at Bellevue on a timeline appropriate for this case. Accordingly, the defense requests leave to file another proposed Order no later than November 15, 2021 (accompanied by a letter motion setting forth the position of BOP and the United States Attorney's Office) compelling MDC Brooklyn to permit Dr. Rosenberg to have a four-hour-long meeting with Mr. Joyner and to allow Dr. Rosenberg to bring into the facility:

- a. two pens;
- b. one notebook with blank lined paper;
- c. various neuropsychological tests printed on plain paper;
- d. six books with neuropsychological stimuli;
- e. nine small plastic cubes approximately one inch in size;
- f. one handheld stopwatch; and
- g. one clipboard.

Alison J. Nathan
11/8/2021

Respectfully Submitted,



Andrew J. Dalack, Esq.
Assistant Federal Defender
Counsel for Andrew Joyner

Cc: AUSA Andrew Rohrbach